

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

- - - - - x
:
UNITED STATES OF AMERICA :
:
- v. - :
:
RICKEY JOHNSON, :
a/k/a "Nigel Dawn Defarren," :
:
Defendant. :
:
- - - - - x

SUPERSEDING
INDICTMENT

S1 21 Cr. 194 (LAK)

COUNT ONE

(Threatening Interstate Communications)

The Grand Jury charges:

1. From at least on or about January 30, 2021, through on or about February 3, 2021, in the Southern District of New York and elsewhere, RICKEY JOHNSON, a/k/a "Nigel Dawn Defarren," the defendant, knowingly and intentionally transmitted in interstate and foreign commerce a communication containing a threat to injure the person of another, to wit, JOHNSON sent electronic messages over the internet to a cable news contributor ("Victim-1") in which he threatened to kill Victim-1, then posted a video to the internet in which he threatened to kill Victim-1.

(Title 18, United States Code, Sections 875(c) and 2.)

COUNT TWO

(Threatening a United States Official)

The Grand Jury further charges:

2. On or about February 3, 2021, in the Southern District of New York and elsewhere, RICKEY JOHNSON, a/k/a "Nigel Dawn Defarren," the defendant, threatened to assault and murder a United States official with intent to impede, intimidate, and interfere with such official while engaged in the performance of official duties, and with intent to retaliate against such official on account of the performance of official duties, to wit, JOHNSON posted a video on the internet in which he threatened to kill a United States Senator ("Victim-2").

(Title 18, United States Code, Sections 115(a)(1)(B) and (b)(4),
and 2.)

COUNT THREE

(Threatening a United States Official)

The Grand Jury further charges:

3. On or about February 3, 2021, in the Southern District of New York and elsewhere, RICKEY JOHNSON, a/k/a "Nigel Dawn Defarren," the defendant, threatened to assault and murder a United States official with intent to impede, intimidate, and interfere with such official while engaged in the performance of official duties, and with intent to retaliate against such official on account of the performance of official duties, to wit, JOHNSON

posted a video on the internet in which he threatened to kill a member of the United States House of Representatives ("Victim-3").

(Title 18, United States Code, Sections 115(a)(1)(B) and (b)(4), and 2.)

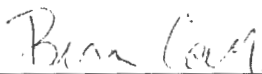
COUNT FOUR

(Threatening Interstate Communications)

The Grand Jury further charges:

4. On or about February 3, 2021, in the Southern District of New York and elsewhere, RICKEY JOHNSON, a/k/a "Nigel Dawn Defarren," the defendant, knowingly and intentionally transmitted in interstate and foreign commerce a communication containing a threat to injure the person of another, to wit, JOHNSON posted two videos to the internet in which he threatened to kill a cable news contributor ("Victim-4").

(Title 18, United States Code, Sections 875(c) and 2.)



FOREPERSON



DAMIAN WILLIAMS
United States Attorney

Form No. USA-33s-274 (Ed. 9-25-58)

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v.

RICKEY JOHNSON,
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Defendant.

SUPERSEDING INDICTMENT

S1 21 Cr. 194 (LAK)

(Title 18, United States Code,
Sections 875(c), 115(a)(1)(B) and
(b)(4), and 2)

DAMIAN WILLIAMS

United States Attorney

Ben Long

Foreperson

1/12/22

Filed superseding Indictment

USMT Moses

MG